

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

*Filed 4/8/05  
5/3/05 4:44pm  
(mtk)*

UNITED STATES OF AMERICA )  
 )  
V. ) M.B.D. NO. 05-10114  
 )  
ANTONIO FERREIRA )

SECOND JOINT MOTION OF THE PARTIES TO EXCLUDE TIME

Defendant Antonio Ferreira is currently charged by complaint in 05-1034-JGD with obtaining counterfeit immigration and identity documents and related crimes in violation of 18 U.S.C. §§ 1546(a), 1028(a)(6) and (f), and 371. The parties discussed this matter on May 2, 2005, and agreed orally to jointly move to exclude an additional 21 days from the time within which the government would otherwise have to obtain an indictment or file an information. Ferreira first appeared before Magistrate Judge Dein on February 17, 2005. The parties have since discussed resolving this criminal proceeding by agreement, and are currently negotiating the specific terms of such an agreement. It is expected that an additional 21 days, commencing on May 5, 2005, and continuing until May 26, 2005, will permit the parties to reach such an agreement before the government is required or inclined to seek an indictment.

Consequently, both parties move under 18 U.S.C. § 3161(h)(8)(A), and §5(c)(1)(A) of the Plan for Prompt Disposition of Criminal Cases that this Court find, based on the above, that the ends of justice served by granting the requested exclusion

YOUNG D.J.  
MOTION ALLOWED

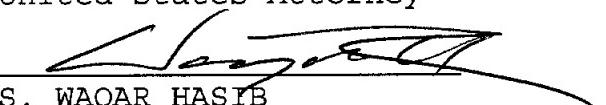
*William G. Young*  
U.S. District Judge  
May 4, 2005

outweigh the best interest of the public and the defendant in a speedy trial, and, accordingly, exclude the requested 21 days in computing the time within which an information or an indictment must be filed under 18 U.S.C. § 3161(b).

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
S. WAQAR HASIB  
Spec. Assistant U.S. Attorney